

**Paul Sharman**

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**From:** Paul Sharman  
**Sent:** Wednesday, July 21, 2021 1:13 PM  
**To:** 'Neal Graham'  
**Subject:** Bryant v McWilliams - Settlement Offer  
**Attachments:** Settlement Agreement - McWilliams.docx

Neal,

Upon further reflection, my client is going to need an indemnification from NS as well. I can't have him testify and then be subject to contribution if your client somehow prevails on the merits. With your permission, I would like to discuss this with Alyssa so that I can get a mutual indemnification between my client and hers prior to the deposition. This is a condition of the settlement between Bryant and McWilliams as well. See attached revised agreement including an additional WHEREAS clause.

Thanks,

Paul

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